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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

JAN 17 1992

**Federal Communications Commission
Office of the Secretary**

**In the Matter of
Administration of the
North American Numbering Plan**

**Undocketed
(Public Notice DA 91-1307)**

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS**

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Pursuant to Sections 1.41, 1.49, 1.405, 1.430 of the Federal Communications Commission's ("FCC" or "Commission") Rules of Practice and Procedure, 47 C.F.R. Sections 1.41, 1.49, 1.405, and 1.430 (1991), and the Commission's October 18, 1991 Public Notice DA 91-1307, the National Association of Regulatory Utility Commissioners ("NARUC") respectfully submits these reply comments addressing comments filed concerning its September 26, 1991 request for an FCC Notice of Inquiry ("NOI") to seek information and comment concerning the issues surrounding the North American Numbering Plan ("NANP").

I. DISCUSSION

A. With the exception of three RBOCs, and the trade association representing, inter alia, RBOC interests, all commenters agree that a NOI to examine at least some of the issues raised in NARUC's petition would be in the public interest.

1. Of those filing comments, ALL non-LEC entities, as well as a trade association representing several hundred small independent LECs, urged the Commission to initiate a NOI to examine issues raised in NARUC's petition.

Twenty-five different entities filed initial comments on NARUC's proposal. Most segments of the industry were represented,

e.g., (1) the North American Numbering Plan ("NANP") administrator - Bellcore ("Bellcore" or "NANPA"), (2) two competitive access providers - Teleport Communications Group ("TCG") and Metropolitan Fiber Systems, Inc. ("MFS"), (3) three trade associations - Telocator representing the "personal communications industry", the National Telephone Cooperative Association ("NTCA") representing 490 small independent local exchange carriers, and the United States Telephone Association ("USTA") representing local exchange carriers including the seven regional Bell operating companies ("RBOCs"), (4) three interexchange/toll service providers - American Telephone and Telegraph Company ("AT&T"), MCI Communications, Inc ("MCI"), and Allnet Communications Services, Inc., (5) two cellular providers - McCaw Cellular Communications, Inc. ("McCaw") and Rogers Cantel, Inc. ("Cantel"), (6) six of the seven RBOCs - Ameritech, US West, Southwestern Bell, BellSouth, NYNEX, and Pacific Telesis, (7) four independent local exchange carriers - GTE, Rochester Telephone Corporation ("Rochester"), United Telecommunications, Inc. ("United"), and Centel Corporation ("Centel"), (8) Canada's only "national terrestrial carrier" - Unitel, (9) Telecom Canada, an carrier handling all toll service for its Canadian Local Exchange Carrier members, and (10) two public utility commissions - the District of Columbia Public Service Commission ("DCPSC") and the Florida Public Utility Commission ("Florida").

Of the twenty-five commenters, only four ask the Commission to flatly reject NARUC's petition, i.e., - three RBOCs - Ameritech, US West, and Southwestern Bell, and USTA, the trade association representing, inter alia, RBOC and other LEC interests. Twelve of the remaining commenters support without ANY expressed reservations or caveats - in most cases with some enthusiasm - NARUC's request for an NOI. See generally, the December 20, 1991 Initial Comments filed by TCG, MFS, Telocator, AT&T, MCI, Allnet, McCaw, Centel, Rochester, Unitel, DCPSC and Florida. Indeed, some commenters even suggested expanding the inquiry to address several issues not specifically raised in NARUC's petition. See, e.g., MCI Comments at 8; AT&T Comments at 2-3; Allnet Comments at 1-2.

2. Several LEC's, including two RBOC's and the country's largest independent, support initiation of a NOI or NOI(s) to examine some of the issues raised in NARUC's petition.

Centel "...agrees with NARUC that the pending exhaustion of a number of the codes is causing...industry to spend untold millions..." and urges the Commission to "establish a comprehensive framework under which numbering code issues can be addressed.." Centel Comments at pages 2 - 3. Centel's only caveat is that "it is crucial that the work of...[various industry groups, e.g., Committee T-1, Exchange Carrier Standards Association, etc.]...be allowed to continue.." The company notes, however, that the FCC "...can contribute to this process by ensuring that the industry recommendations are administered in a fair and equitable manner so that a particular numbering plan does not benefit a particular interest group." Id.

NTCA, representing 490 independent LECs, supports NARUC's proposal. NTCA caveat's its remarks by noting that it is not yet clear if FCC intervention is needed to address NANP exhaustion - implying that the information gathered during the NOI process could clarify what, if any, action is required by the public convenience and necessity. NTCA Comments at 1-2.

Telecom Canada does not specifically request rejection of NARUC's request - only stating that "[t]he existing industry processes have adequately addressed Telecom Canada's numbering requirements..." and urging the FCC, to the extent a NOI issues, to take into account the sensitivities of NANP users under non-U.S. government regulatory schemes.

Even BellSouth "...supports NARUC's request to initiate a NOI to address most of the...issues raised in [its]...Petition." BellSouth does not, however, support examination of FGB CIC expansion, 800, and CIID codes - suggesting that these areas "...would be better addressed in other proceedings or forums." BellSouth Comments at page 2.

Similarly, while expressing strong reservations concerning FCC treatment of most of the issues listed in NARUC's petition, GTE submits that three issues posed, e.g., the role of Bellcore as NANP administrator, methods to reduce demand for scarce codes or augment the supply of numbers, and an investigation of an equitable plan for assigning NANP codes, "may be fertile ground for an FCC inquiry." GTE Comments at 7.

Pacific Telesis also, although for various reasons urges that additional monitoring reports and examination of the current NPA exhaustion plan is unnecessary and would be counter productive, supports an NOI to address (1) the NPA exhaustion post-1996 and (2) LEC cost recovery for expansion efforts and (3) the costs associated with the use of various codes. PacTel Comments at ii, 7-8, 10.

NYNEX too -- although contending that a single NOI would not be suitable to address all the issues raised by NARUC and that some issues, e.g., II and NPA codes, should not be addressed in an FCC proceeding at all -- suggested a series of NOIs as the industry groups complete the groundwork on various numbering issues, e.g., CIC code conservation proceeding after 4 digit CICs are implemented, NXX assignment guidelines proceeding after Bellcore issues a proposal, a proceeding to examine the need for additional monitoring, etc. NYNEX Comments at 10, 5-6, 10-11.

United also partially supports NARUC's request for an NOI on NANP administration contending that the inquiry should be limited to the appropriateness of the guidelines currently being drafted by Bellcore. United at 1-2.

B. The primary rationale advanced for rejecting NARUC's petition, or limiting the scope of the NOI implemented, e.g., the alleged efficacy, and possible interference with, the current "industry consensus" process, lacks merit.

Less than half of those commenting - all LEC affiliated, urge either some limitation on the scope of the NOI issued [six] or flat rejection of NARUC's request [four]. The primary rationale urged for either limiting or rejecting NARUC's NOI request advanced by

these parties is the alleged efficacy of the existing process and/or the need to avoid impeding current efforts in the existing industry committees and in other FCC dockets.

1. NARUC has asked for an NOI, not a Notice of Proposed Rulemaking. Moreover, NARUC has only asked for an expeditious examination of the issues; we have not yet suggested that the FCC stay ongoing activity.

First, it should be noted, NARUC has only asked for a Notice of Inquiry, i.e., a proceeding to (i) collect information from all industry participants on the listed and related issues and (ii) propose actions for issues that need to be addressed. NARUC has not yet asked that currently ongoing programs be delayed or stayed or that any specific rules be implemented. At this time, we are only seeking an expeditious collection of information and examination of the issues to see what additional measures should be taken. Because of the tremendous amount of money involved and the significant impacts on all industry participants, we urge the FCC to give this proceeding priority and initiate NOI procedures as expeditiously as possible.

2. As the comments filed in this proceeding demonstrate, except for some LEC-affiliated commenters, all industry commenters, including the NANP administrator itself, do not believe that the "industry consensus process" is adequate.

It is apparent from an examination of the comments filed that the overwhelming majority [20 of 25] of commenters agree that NARUC's request has merit. Twelve commenters support the request without reservation, two more explicitly support the petition, but offer some precatory input, and six others support an NOI but would exclude certain issues from its scope. The natural conclusion to

be drawn is that a significant number of industry participants believe the current process is deficient in some respects. Some are very explicit in their criticisms of the current process, e.g., MCI Comments at 5-7 where it alleges that Bellcore tends to favor its owners when contention arises over limited resources, that Bellcore's inaction directly contributes to the exhaustion of NPA codes, etc.; MFS comments at 5 and Teleport at 1 where both companies argue that as competition increases, so does the impetus for abuse of the current process; McCaw at 2-3, 6-10, 12-12, where they contend that the process is closed to many important industry segments, that there has been discrimination against wireless services, and that the NANPA approaches problems from a wireline perspective.

Even the current NANP administrator, Bellcore, although proposing a different approach ¹, agrees that problems remain that the industry consensus process is ill-suited to resolve. Specifically, they state that "...[s]ignificant numbering issues (e.g., non-LEC ISDN numbering) have remained unresolved for a long period of time or have been resolved through other than industry

¹ Bellcore, in a January 6, 1992 letter No.IL-92/01-013, titled "North American Numbering Plan Administrator's Proposal On the Future of Numbering in World Zone 1" ("Letter"), sent to industry representatives, proposes an advisory counsel "to advise the NANPA on issues relative to the administration and design of the NANP...raised by the NANPA, industry entities, users, vendors, or regulatory agencies." Letter at page 27. According to the proposal, "[t]he formation of a...council situated between the industry as a whole and...[the FCC, Canada's DOC, and Caribbean regulatory bodies]...will fill a void that could...resolve industry issues without undue and potentially conflicting escalation to the regulatory bodies of the [participating] countries."

consensus even though the industry consensus process was used. To a substantial degree, the lack of resolution of such issues is due to the lack of a forum(s) responsible for or willing to discuss all aspects of a numbering issue., i.e., technical, standards, regulatory, etc. issues have been discussed with the FCC, in Committee T1, in the Industry Carrier Compatibility Forum (ICCF), in the Carrier Liaison Committee (CLC), and even in ad hoc committees...In each case, discussion of issues is rightfully limited to the scope of the organization's charter. In most cases, numbering issues cover the entire spectrum of telecommunications concerns and therefore cannot be completely resolved in any one particular forum."(Emphasis added) Letter at 27.²

In the comments filed in this proceeding, Bellcore also noted that, in spite of the fact that "...there is no need or basis for instituting a broad inquiry to address issues such as ...[those proposed in NARUC's petition]..." that a "numbering-related inquiry could prove salutary for other reasons." Bellcore comments at 5. Specifically, such an inquiry could prove informative and facilitate independent LEC and NARUC/state commission participation in the NANP consensus process. Bellcore Comments at 5-8.

² Bellcore has succinctly stated one of the principle concerns driving NARUC's request. It is true that, "in most cases, numbering issues cover the entire spectrum of telecommunications concerns." In many cases, specific problems can be resolved in isolation in a particular proceeding. However, almost invariably the solutions will affect other aspects of the numbering scheme. NARUC believes the process of resolving all these issues need to be examined in one proceeding to assure that the incidental effects of the proposed solutions are coordinated.

II. CONCLUSION

Accordingly, (1) because it is possible that the plan ultimately implemented may favor particular industry players, (2) because of the potential impact on ratepayers and the clear need, which even Bellcore acknowledged in its July 19, 1991 letter to the FCC, for the "...views of state regulators..." user and other affected telecommunications industry groups to "...be taken in account in any industry-wide efforts [Bellcore] undertake[s], and (3) because the FCC entertains complaints with respect to the national numbering plan, NARUC respectfully requests that the FCC issue a Notice of Inquiry, seeking information and comment regarding the many issues relevant to NARUC administration.

Respectfully submitted,



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